

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

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THOMAS W. COLE
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE

Julian M Johnson

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

RIVIANA Foods INC.

TEAMSTER LOCAL 984

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, JULIAN M. JOHNSON
(name of plaintiff)

is a citizen of the United States and resides at 1629 BRITTON
(street address)

MEMPHIS UNITED STATES TENNESSEE
(city) (country) (state)
38108 901 864-8788
(zip code) (telephone number)

3. Defendant RIVIANA FOODS AND TEAMSTER LOCAL 984
(defendant's name)
 lives at, or its business is located at (214 S. LAUDERDALE ST. MEMPHIS TN,
(street address)
38106) (3020, SANDBROOK ST, MEMPHIS TN. 38116

4. Plaintiff sought employment from the defendant or was employed by the defendant at
2314 S. LAUDERDALE ST.
(street address)
MEMPHIS UNITED STATES TENNESSEE 38106
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 27 NOVEMBER 2012
(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about _____
(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about AUG. 2012
(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 26 AUG. 2014. (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) ☒ race, (2) ☒ color, (3) ☒ sex, (4) ___ religion, (5) ___ national origin, defendant

(a) ___ failed to employ plaintiff.

(b) ___ terminated plaintiff's employment.

(c) ☒ failed to promote plaintiff.

(d) ☒ FAILED TO PROTECT RIGHTS UNDER TITLE VII

10. The circumstances under which defendant discriminated against plaintiff were as follows: SEE ATTACHED

11. The acts set forth in paragraph 9 of this complaint

- (a) ☒ are still being committed by defendant.
- (b) ☐ are no longer being committed by defendant.
- (c) ☐ may still be being committed by defendant.

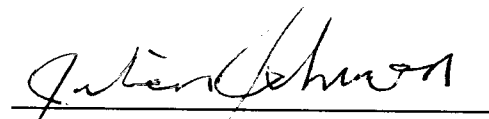
12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ☐ Defendant be directed to employ plaintiff, or
- (b) ☐ Defendant be directed to re-employ plaintiff, or
- (c) ☐ Defendant be directed to promote plaintiff, or;
- (d) ☒ Defendant be directed to AWARD PLAINTIFF INJUNCTIVE RELIEF; MONETARY DAMAGES, INCLUDING BACK PAY, FRONT PAY, IF APPLICABLE COMPENSATORY AND PUNITIVE DAMAGES; ATTORNEY FEES AND COSTS.

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes (✓) No ()


SIGNATURE OF PLAINTIFF